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November 5, 2021

Via ECF

Southern District of New York  
ATTN: HON. ALISON J. NATHAN, U.S.D.J.  
40 Foley Square, Room 2102  
New York, New York 10007

**RE: HYUNHUY NAM v. PERMANENT MISSION OF THE REPUBLIC OF KOREA TO THE  
UNITED NATIONS, et al.**  
**CASE NO.: 1:21-cv-6165-AJN**  
FOLLOW UP REGARDING LETTER FILED ON NOVEMBER 5, 2021

Dear Judge Nathan:

As Your Honor is aware, this office represents the defendants, Permanent Mission of the Republic of Korea to the United Nations (hereinafter, the “Mission”) and three of its diplomats, Hyon Cho, Jinho Jo, and Daeyong Chung (collectively, “Diplomats”) (Diplomats and Mission, collectively, “Defendants”), in the above-referenced matter.

Earlier today, Defendants filed a letter seeking an enlargement of the page limits to the reply brief due on November 9, 2021 (DE38), but that letter was inadvertently filed under the wrong title as the Reply Memorandum of Law.

Kindly be informed that Defendants will file a separate reply memorandum of law on or before November 9, 2021, and that docket entry #38 is not Defendants’ reply on their motion to dismiss. Defendants do, however, still request the enlargement of the page limits for the reply memorandum of law as requested in docket entry #38. A copy of the earlier-filed request is submitted herewith for the Court’s convenience.

We apologize for the confusion and thank the Court for its time and attention in this matter.

Respectfully submitted,

*/s/ Sean S. Kwak*

Sean S. Kwak

cc: Plaintiff’s counsel – via ECF

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**RE: HYUNHUY NAM v. PERMANENT MISSION OF THE REPUBLIC OF KOREA TO THE UNITED NATIONS, et al.**  
**CASE NO.: 1:21-cv-6165-AJN**  
**REQUEST FOR ENLARGEMENT OF PAGE LIMIT FOR PLAINTIFFS' REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF MOTION TO DISMISS**

Dear Judge Nathan:

As Your Honor is aware, this office represents the defendants, Permanent Mission of the Republic of Korea to the United Nations (hereinafter, the "Mission") and three of its diplomats, Hyon Cho, Jinho Jo, and Daeyong Chung (collectively, "Diplomats") (Diplomats and Mission, collectively, "Defendants"), in the above-referenced matter.

Defendants are currently preparing their reply in further support of their motion to dismiss. Pursuant to the scheduling order (DE35), Defendants' reply papers are due on November 9, 2021. Defendants respectfully request an enlargement of the page limit to fifteen (15) pages for the reasons below.

Mindful of Your Honor's Individual Rules, this office notes that the page limit for the reply memorandum of law for motions is 10 pages. § 3(B). This firm has completed a draft of the memorandum of law, resulting in 13 pages with additional formatting to be done. Most of the memorandum concerns arguments countering the deficient nature of Plaintiff's declarations and arguments. Although Plaintiff's opposition was succinct, this firm is compelled to address all the arguments which may be gleaned from the opposition papers, to cover all bases.

For the foregoing reasons, Defendants request that the page limit for Plaintiffs' motion for summary judgment be enlarged to fifteen (15) pages. This firm will endeavor to minimize the page  
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count as much as possible.

We thank the Court for its time and attention in this matter.

Respectfully submitted,

*/s/ Sean S. Kwak*

Sean S. Kwak

cc: Plaintiff's counsel – via ECF